

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

18 Cr. 567 (VSB)

CHRISTOPHER COLLINS,
CAMERON COLLINS, and
STEPHEN ZARSKY,

Defendants.

DECLARATION OF KENDALL WANGSGARD

I, Kendall Wangsgard, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a senior associate at the firm of Baker Hostetler LLP, counsel for Congressman Collins (“Congressman Collins”) in the above-captioned matter.
2. I make this declaration in connection with Defendants’ Motion for the Production of *Brady* and Rule 16 Material. I am a member in good standing of the bars of New York, Washington, D.C. and Massachusetts and am admitted to practice before this Court. I have entered an appearance as counsel of record for Congressman Collins in this matter.
3. I have personal knowledge of the facts referenced herein.
4. In connection with my representation of Congressman Collins in this matter, I have reviewed various disclosures provided by the U.S. Attorney’s Office for the Southern District of New York, including those made pursuant to Fed. R. Crim. P. 16.



6. Attached hereto as **Exhibit B** is a true and correct copy of an email chain dated between July 2, 2018 and July 17, 2018, by and among counsel for Congressman Collins and the U.S. Attorney’s Office for the Southern District of New York.
7. Attached hereto as **Exhibit C1-C3** are true and correct copies of correspondence from AUSAs Williams, Hartman, and Nicholas to counsel for each Defendant dated August 22, 2018.

8. Attached hereto as **Exhibit D** is a true and correct copy of correspondence from Mauro M. Wolfe, Esq. to AUSAs Williams, Hartman, and Nicholas, dated September 13, 2018.
9. Attached hereto as **Exhibit E** is a true and correct copy of correspondence from Jonathan Barr, Esq. to AUSAs Williams, Hartman, and Nicholas, dated November 8, 2018.
10. Attached hereto as **Exhibit F** is a true and correct copy of correspondence from AUSAs Williams, Hartman, and Nicholas to counsel for Defendants, dated November 27, 2018.
11. Attached hereto as **Exhibit G** is a true and correct copy of correspondence from AUSAs Williams, Hartman, and Nicholas to Jonathan Barr, Esq., dated January 4, 2019.
12. Attached hereto as **Exhibit H** a true and correct copy of an email chain dated between January 25, 2019 and February 5, 2019, by and among counsel for Cameron Collins and the U.S. Attorney's Office for the Southern District of New York.



I declare under penalty of perjury that the foregoing is true and correct.

Dated: Washington, DC
February 8, 2019



Kendall E. Wangsgard

A handwritten signature in blue ink, appearing to read "Kendall E. Wangsgard", is written over a blue horizontal line. The signature is fluid and cursive.